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Before the
Federal Communications Commission
Washington, D.C. 20554

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APR 20 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of
Amendment of the Amateur Service Rules to
Implement a Vanity Call Sign System.
PR Docket No. 93-305

Combined comments from:

Comstock Amateur Radio Association; Donald Freeman, WS2Z, President
Silver Circle Amateur Radio Association; Larry Oakley, W7AAA, President
Wide Area Data Group, Inc.; Richard Warren, Jr., N7RH, Secretary/Licensee.

I. Summary: The Directors and Members of the above-named organizations believe that the concept of the proposed vanity call sign assignment system is a positive action by and for the Commission. This action will fulfill a desire on the part of many amateur radio operators to hold a personalized call sign. We also believe that the proposed fee structure is both fair and equitable to the prospective applicants and monetarily beneficial to the Commission.

II. Availability: The obvious first question to the Commission's proposal would be as to why only a single vanity call would be issued to an applicant. The availability of additional vanity call signs, up to a limit of three, would allow an individual to obtain a vanity call and allow the option of retaining the call of a deceased family member. An applicant could also obtain a vanity call for a vacation or summer residence; an option which might be exercised in the case of such residence being "out of district" from the applicant's primary residence. A limit of three vanity call signs per applicant would be revenue positive for the Commission without allowing for the "warehousing" of vanity call signs. The second question would address the matter of the surrendering of the currently held call sign in favor of a vanity call sign. We propose that an applicant for a vanity call sign not be required to automatically surrender a currently held call sign, whether issued through the current sequential system or through some previous mechanism within Part 97 of the Rules which authorized the issuance of a preferred call sign. Should this part of the proposal ultimately be adopted, this would render the two year waiting period moot in this case. We understand that the holding of more than one amateur call sign simultaneously may require that the matter of secondary call sign issuance be revisited in a future proceeding.

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III. Club Call Signs: Since club call signs may only be issued to applicants who are already licensed radio amateurs, the question is posed as to why the applicant must apply for a club call sign from the sequential assignment system and then, after receipt of such club station license, reapply for a club vanity call sign. This seems an unnecessary burden on the staff of the Commission, since it requires the processing of two separate and distinct applications for a club call sign, when one application for an instant vanity call sign seems the more logical course. The issuance of a club vanity call sign based upon the class of license held by the licensee (trustee to be) seems discriminatory in that licensees of club stations can change for a variety of reasons. Thus, if all licensees were not holders of Extra class licenses, those holding Advanced class licenses or below would only be eligible for a lesser preferred vanity call sign.


IV. Waiting Period: We propose that any call sign surrendered for the issuance of a vanity call sign not be reissued for the same two year period as provided for in the other elements of the Commission's proposal. To release the surrendered call sign immediately for reissuance within the vanity program would cause a great deal of confusion for call sign data bases, QSL bureaus, periodical subscription services and the on the air activities of many amateurs. One might not be sure to whom one was speaking. Until the initial "dust has settled", enforcement would be extremely difficult and the evolution of a giant "who's who in amateur radio" is a distinct and very real possibility.

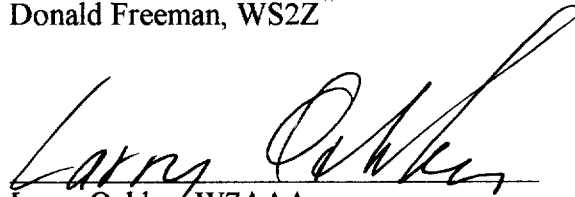
V. Call sign Blocks: For the proposed vanity call sign system to be equitable to any and all concerned, we propose that all available call sign blocks be available, including those not currently issued. Examples of this would be: WA7AB, NF7RS and the so-called "dead" calls, including the 1x3 call signs beginning with W and K.

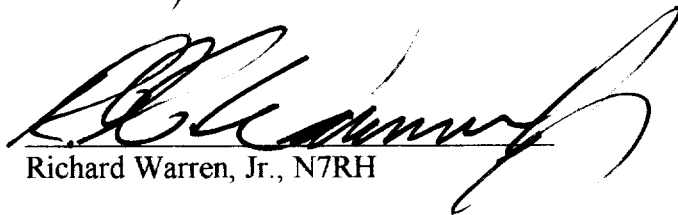
VI. Windows for Application: We propose that the vanity call sign program be implemented in stages, allowing for 60 or 90 day windows within which each class of licensee would be eligible to apply for a vanity call sign within his assigned callsign group or below. The first window would allow for Extra class licensees, those applicants of any class of amateur license wishing to recover the call sign of a deceased family member and those requesting a club call sign to apply. The next window would allow Advanced class licensees to apply and then continuing in descending order through the remaining classes of amateur license. After the initial application period, perhaps one year for all license classes, the vanity program would then be available continuously at the discretion of the individual licensee.

VII. Conclusion: This is a positive step forward, both for the radio amateurs of the United States and the Commission. Revenue enhancement, mutual trust and understanding and a sense of working together are the results of the implementation of this vanity call sign program at the earliest possible date.

Respectfully submitted for consideration,


Donald Freeman, WS2Z


Larry Oakley, W7AAA


Richard Warren, Jr., N7RH